

<p><b>Palani Karupaiyan,</b> <b>Vs</b></p> <p><b>1)Experis IT</b> <b>2) ManpowerGroup</b> <b>3)Jonas Prising, individually and in his official capacity as Chairman, CEO of the ManpowerGroup</b></p> <p><b>4) Samantha Moore, individually and in her official capacity as Recruiting Lead of the Experis IT</b></p>	<p>IN THE UNITED STATES DISTRICT COURT FOR THE SOUTERN DISTRICT COURT NEW YORK</p> <p>Docket # 20-cv-1305</p>
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### **COMPLAINT -refile**

Plaintiff Palani Karupaiyan (“Plaintiff” or “Mr. Karupaiyan”, “Karuaiyan”) pro se, files this Complaint and Jury Demand against Defendant(s) Experis IT (“Experis”), Samantha Moore, (“Moore”) *individually and in her official capacity as Recruiting Lead of the Experis IT, ManpowerGroup, Jonas Prising individually and in hiw official capacity as Chairman, CEO of the ManpowerGroup.* All defendants are collectively called “Defendant(s)”

### **INTRODUCTION**

1. This suit arises from Defendant’s decision to refused/failure to hire job, Failure to accommodate my disability, Unequal terms and conditions of my employment to Plaintiff, Favoring Foreigner employee to replace US citizen employee, because of his Race, Color, gender, religion, Age, Disability, US Citizenship, National of Origin, Favoring Foreigner employee to replace US

citizen employee/favoring foreigner against US citizen in employment and  
etc/more in violation of Title VII of the Civil Rights Act of 1964. ("Title VII"),

The Age Discrimination in Employment Act (ADEA),

The Americans with Disabilities Act (ADA) and its amended,

U.S.C. § 1324b (Immigration and Nationality Act (INA)),

Racketeer Influenced and Corrupt Organizations Act-Rico

Sarbanes–Oxley Act of 2002,

New York Human Rights Law (NYHRL),

The New York City Human Rights Law (NYCHRL),

42 U.S.C. §§ 1981-1995 (section 1981).

Civil Rights Act of 1991 (Section 1981)

Genetic Information Discrimination act (Gina)

Racketeer Influenced and Corrupt Organizations Act-Rico,NY-  
rico,NJ-rico (RICO, NY/NJ RICO REFERED AS RICO)

Sarbanes–Oxley Act of 2002,

False Claims Act (fca), NY-false claim act (Ny-fca), New jersey False  
claim act (NJ-fca)

Immigration Reform and Control Act of 1986 (IRCA)

CHILD SUPPORT ENFORCEMENT-18 U.S.C. § 228

18 U.S.C. § 1956, money laundering law. 18 U.S.C. § 1957

18 U.S.C. § 1960: Money Transmitters

The IRS Whistleblower Law, Taxpayer First Act (TFA) ,26 U.S.C. §  
7623(d)

26 U.S. Code § 7201. Attempt to evade or defeat tax 26 U.S.C. § 7203

and § 7206(1)

These acts are hereafter referred as **plaintiff claimed acts.**

2. Plaintiff have 20+ yrs experience with full stack developer skills i.e Plaintiff has end to end and top to bottom needed of software development experience. More than 25 skills certifications such as MCTS,MCP,MCPD, Ocp 8i, Ocp 9i, ocp10g,OcP 11g, SAP Hana In Memory (BI/DW) certification, SAP mobile certification, and ToGAF architect certification. Im in the Plan of doing PMP – Project Management Professional. Full-stack experience and professional certification mean, plaintiff can alone take responsibility software development from end-end (start to finish) and deliver the software timely manner. Multiple projects I have delivered on time or ahead of time.

3. Since Feb 2015 to Oct 2017, Plaintiff worked with Dept of Education, New York City (DOE) , plaintiff successfully delivered 5+ projects and I completed them timely manner or ahead of scheduled time. Plaintiff alone worked in projects end to end including Architecting, worked with another team member and for delivering theirs task on timely manner or ahead of scheduled time.

4. Plaintiff filed the original complaint in 2019 with forma pauperis. Multiple attempts, Multiple media/way US Marshal service was trying to serve the complaint but they were not able to serve because i) they operate letter box office at 99 Park Ave Suite 920, New York, NY 10016 to evade tax including payroll tax/money laundering. II) Having letterbox office at NY city and work from remote/home and did not put any request to

letter forwarding. Defendants secretly hiding to avoid US Marshal service to serve the complaint to them.

5. I called few private process server to serve the summon/complaint to the defendant, the private process agency are deny my request due to corona virus.
6. Due to progressing disability, my genetic malformation stitus inversus totalis was serious risk, was not able to serve the defendants so time barred for any and all claims of plaintiff against the defendants.
7. Even though plaintiff is entitled to depend the US Marshal service to serve the complaint, plaintiff put his own effort to serve the complaint to the defendants Experis thru USPS, email, facebook/twitter but the defendants did not appear to District Court or acknowledged my complaints. This is contempt of court.
8. Because of EEOC and its proceeding with defendants tricked the plaintiff to timely issue right to sue letter, because defendants were absent/disappeared, unable to serve the complaint by USMS/Plaintiff, none of the claims of plaintiff against the defendants were time barred.
9. For this re-filing complaint, the defendants did not appear after serving, I will keep this court permission to file default judgment timely manner against the defendants including unbailable warrants with 20yrs jailing contempt of court, money laundering for Ms Moore and Mr Jonas Prising, CEO, of ManpowerGroup and Experis.

#### **PARTIES**

10. Plaintiff Palani Karupaiyan is a 48-year-old. Since Jun 2018 I had apartment is evicted exhibit(a) and unable to secure any stable resident/apartment now. Exhibit(b). I will keep this Court permission for using my email id

[palanikay@gmail.com](mailto:palanikay@gmail.com) for communication with defendant(s) and Court. I will receive copy of order thru my email [palanikay@gmail.com](mailto:palanikay@gmail.com) from this Court. I have signed a consent form for Electronic Service. Exhibit (c).

11. Plaintiff belong to **Tamil speaking ethnicity, Black race/color, male** age 50, hindu religion. English is not primary language to the plaintiff. Plaintiff was schooled in native Tamil language which is oldest and longest surviving classical language. Native language name of Plaintiff is **pazhani** as signed

12. Working as software engineer/professional is only source of income to the plaintiff.

13. Experis has offshore development center in India for the software development on behalf them and for their business/IT development partner in United States.

14. Experis IT is specialized expertise in developing software in IT, Engineering, software engineering, bodyshopper in Information technology(IT)/software, placing temp employee in software/IT, **outsourcing the US corporate software development to their offshore development center in India**. They precisely deliver in-demand talent for

mission-critical positions, enhancing the competitiveness of the organizations and people we serve. They also apply our expertise to provide a suite of proven workforce solutions that improve our clients' productivity, efficiency and cost containment. **Experis do not do any business in India with any Indian corporation or any type of clients.**

15. Experis has framework to help and outsource the US corporation's software development to India and **for evade the payroll tax and for money laundering purpose.** Theses US corporations are the client/IT development, business partners to Experis.

16. Experis is a dedicated business unit of ManpowerGroup a third ranked world leader in employment services for more than 60 years, and a recognized pioneer in the industry. ManpowerGroup is fortune 500 company and revenue of more than \$21 billion per year. The grow is kept on going up.

17. Defendants have off-shore development center in India for the outsourced project from USA.

18. ManpowerGroup and Experis' business address is **99 Park Ave, 6<sup>th</sup> floor, NYC, NY 10016**. Both share the same address and CEO.

19. Experis and ManpowerGroup are single integrated employer/potential employer to the plaintiff. s

20. ManpowerGroup doing business in the name of **Right Management** which provide workforce solutions.

21. Samantha Moore (Moore) is work with her official capacity as Recruiting Lead of Experis IT. Ms Moore is middle age American white women with Christian.

22. Where ever in the complaint/pleading Experis is referred, it also referred ManpowerGroup as well.

23. Jonas Prising is European, European origin and white color and race.

24. Experis, ManpowerGroup, Ms Moore, Mr Prising are (collectively) referred as defendants.

25. Experis work on Federal contracts, many states and local city contracts. Also Experis has software development/ software implementation contract with many fortune 500 US corporations. Experis help US corporations offshore IT develop to evade the payroll tax and money laundering.

26. Experis does not develop/implement software business in India for the Indian business or Indian Govts, Indian local govts.

27. Experis have letter box office in few cities in India for cash delivery to the managers who work in the US corporations, US software development contracts.

28. Defendants were individually also benefited by preferring foreigner against US citizen in the DOE contracts.

29. Plaintiff is aggrieved person in his employment by the defendants/Experis's wrongdoings.

30. During the recruitment process, Ms Moore told the plaintiff that Experis all staff work from home.

#### **JURISDICTION AND VENUE**

31. This Court has jurisdiction over the subject matter of this civil action pursuant to

Title VII of the Civil Rights Act of 1964. ("Title VII"),

The Age Discrimination in Employment Act (ADEA),

The Americans with Disabilities Act (ADA) and its amended,  
U.S.C. § 1324b (Immigration and Nationality Act (INA)) ,  
Racketeer Influenced and Corrupt Organizations Act-Rico  
Sarbanes–Oxley Act of 2002,  
**New York Human Rights Law (NYHRL),**  
The **New York City Human Rights Law (NYCHRL)**,  
42 U.S.C. §§ 1981-1995 (section 1981).  
Civil Rights Act of 1991 (Section 1981)  
32. **Venue is proper in this District.**

## **FACTS**

33. Plaintiff has 20+ yrs experience with full stack developer skills. More than 25 skills certifications such as MCTS,MCP,MCPD, Ocp 8i, Ocp 9i, ocp10g,OcP 11g, SAP Hana In Memory (BI/DW) certification and ToGAF architect certification. Plaintiff is in the Plan of doing PMP- Project Management certification. Im 20 times more productive person than any average software engineers.

34. Plaintiff is skillful to work any software/database/reporting/bi/bw/ datawarehouse/ gui/.net/sql server/mobile software development /xamarin any and all tool used/need for enterprise business needed without previous experience or without proving training.

35. Mr Karupaiyan is born with Situs inversus Totalis (DNA level genetically disability).

36. Situs Inversus Totalis(“Situs”) is birth defect. Situs inversus is DNA level error and/or DNA mutation and/or Genetic Disorder.

37. Situs inversus Totalis is combination/includes 1.Dextrocardia, 2. Ambidextrous (Both handed), 3.Primary ciliary dyskinesia (PCD-lungs), also called immotile ciliary syndrome or Kartagener syndrome.

38. Primary ciliary dyskinesia (PCD), also called immotile ciliary syndrome or Kartagener syndrome, is a rare, ciliopathic, autosomal recessive genetic disorder

that causes defects in the action of cilia lining the respiratory tract (lower and upper, sinuses, Eustachian tube, middle ear), fallopian tube, and flagella of sperm cells. The phrase "immotile ciliary syndrome" is no longer favored as the cilia do have movement, but are merely inefficient or unsynchronized.

Respiratory epithelial motile cilia, which resemble microscopic "hairs" (although structurally and biologically unrelated to hair), are complex organelles that beat synchronously in the respiratory tract, moving mucus toward the throat. Normally, cilia beat 7 to 22 times per second, and any impairment can result in poor mucociliary clearance, with subsequent upper and lower respiratory infection.

39. Situs Inversus Totalis is carry forward generation after generation in DNA/Gene level and most likely may appear after 5 generations.

40. Situs inversus Totalis is that whole body is mirror image of normal human being e.g when every human being has heart on left side, plaintiff have heart on right side. Appendicitis is located on right side, plaintiff has on left side (**Dextrocardia**). Internally further, for every one lungs cilia swipe up to clean the aged mucus, for plaintiff lungs cilia's certain percentage swipe the mucus down ("PCD", due to mirror image of body), as well the blood supplying to brain, taking blood out of brain mechanism is not formed properly as lungs cilia explained.

41. Plaintiff is suffering from diabetic with A1c 14+ where a1c 12 is extreme serious diabetic.

42. I have worked from Feb 2015 to Oct 2 2017 (on or around) with Dept of Education , New York city, (DOE) on DOE's Contractor Software development. During my working time with DOE, the DOE's contractor is changed. Experis become contractor of DOE for IT and Software development service.

43. DOE had more than 60+ foreign software engineers were working in DOE thru its contractors which were secretly by Experis. They had illegal secret deal with DOE managers.

44. Between Jun 2017 to Dec 2017, When DOE's contractor is changed, most of the **foreign software engineers** were recruited (switched) by Experis and continues working with DOE without losing a day work or losing a day income.

45. When I asked other DOE contract foreign employees who is the contractor they continues to work with DOE, they gave me the Mrs Moore's (Experis) contact details.

46. On Sep 2017, multiple times I called Moore and requested her to recruit me to work with DOE on Experis' contract. Mrs Moore took my resume and asked my linked in profile as she needed. I also provided my linked-in profile to Ms Moore as she needed.

47. On Sep 2017, Talked to Moore that there was a mobile development contract job opened with DOE , Mrs Moore replied me that she wanted to employ Sreyashi Chatterjee because Mrs Chatterjee is young (30 yrs old) foreign national women in

the job and Chatterjee was employed. Until today this young foreign national women is working with DOE.

48. On or around Oct 04 2017, again I talked Mrs Moore when there was two more position opened. **Exhibit (d)**. Also I explained to Mrs Moore that since Oct 2 2017 my contract with DOE is over and Im unemployed and im available to take the job immediately. Im suffering from diabetic, lung defect and need to work so I can take care of the diabetic illness and I need to pay child and family support enforced. I was replied by Mrs Moore that she wanted to employee Kadhar(Kadar) and Sapna who were h1b work permit visa holder with age of 30. Because of Sapna is young white color foreign national woman Mrs Moore wanted Sapna to work in DOE. Because of Kadhar Patten is young white color muslim man foreign national and Because of the DOE's contract co-ordinator Ali Rajpatti and DOE's Tech lead Asiz Ali Khan were Muslim, Mrs Moore wanted to employee Muslim Kadhar with DOE contract so she will not be able to provide me that job because she need to favor Ali and Asif because Plaintiff is Hindu religion and Indian origin.

49. In the recruitment process conversation, Ms Moore told that she heard from Asiz and Ali that I complaint to them that previous DOE contractor did not pay plaintiff timely so Ms Moore will not recruit me for DOE software jobs

50. In this employment recruitment process Mrs Moore called Kadhar and Sapna were incumbents which is not correct and they are not permanent employee of DOE but they are contract employee with foreigner work permit. There two foreign national still today they are working with DOE's contract thru Experis. For the fraudulent purpose and deny my employment, Ms Moore said untrue about Kadar, Sapna employment status.

51. Asif Ali Khan, Ali Rajpatti were muslim and Pakistani origin and white skin.

52. India is majority Hindu Religion County. Pakistan is officialy Muslim county. Since 1947 freedom from British colony, both country has border problem/political problem and had many wars which were won by India.

53. On Oct 05 2017, I talked to Mrs Moore about two more position with DOE. Exhibit(e) and she told that she should employed me in one of these jobs which was denied to me.s

54. Sapna is Marathi speaking ethnicity and Kadar is Telegu speaking ethnicity.

55. On or around second week of Nov 2017, I called Mr Moore and asked to provide me one of the job of Sapna, kadar, chatterjee positions because **Im need**

**job to take care of diabetic and I need to pay child support.** She told me that Im sick old black Indian and go back to India to work in the offshore development. When I told Ms Moore that I need job from DOE/Experis to pay child and family support otherwise family court should jail me, she replied me that Experis did not work for the best interest of any US citizen or family court and told me to go to hell. Also **Moore told that any stupid sign the child support order why should Experis honor it.**

When Ms Moore told me to go back to India to work on offshore development, I asked Ms Moore why there is a offshore development, she replied that for the purpose of payroll tax evasion/Money laundering against United states the Experis has offshore development center.

Also Ms Moore told me that If I look job with Experis in this country she should the heck out my kids and endanger them, go back to India to work in offshore development.

56. During the recruitment process, I told Ms Moore that Im 20 time efficient in software development life cycle, I can complete the project timely and ahead of the schedule, Ms Moore replied that this type of candidate is not needed for her because she wanted work slowly and bill the DOE more and pay more commission to the DOE managers so she wanted to hire foreign software engineer who should listen and obey her.

57. During the hiring process, Ms Moore told the plaintiff that CEO define the corporate policy to prefer to hire foreigner against US citizen, offshoring the software development, payroll tax evasion , Experis wanted to prefer and hire young foreigner and not to hire disabled people from USA

58. During the hiring process Ms Moore said that they can buy any officer of DOE to employ foreign engineers against US citizen so defendant can tax evade including payroll tax.

59. During the hiring process Ms Moore said that the defendant have offshore development in India for tax evade including payroll tax and money laundering.

60. Defendants' Experis and Ms Moore wrong doings against me and United States are intentional.

61. I have more experience and expertise than Chatterjee, Kadhar Patten and Sapna Mudliar or any other software engineer's work with DOE in Experis's contract. I have applied all the jobs opened in DOE/Experis while the DOE switching the contractor.

62. Defendants did wrong doing against me is because of my Race, color, Sex/Gender, religion, National Origin, age, Disability and US citizenship.

63. Because of unemployment and I was not unable to pay child support, family court jailed me for two weeks in 2018 because of Experis refused to hire me when

favor to hire foreigners. In 2019 two weeks family court jailed me. Both time I was not able to pay child support because I was unemployed.

64. Due to the wrong doing of the defendants, still Im not able to find job and unemployed and did not have enough money to take care of illness and continues suffering from kidney, bladder damages/injuries blood in the urine which are caused by diabetics.

65. Last 3 weeks, 8+ hrs each day I'm drafting this complaint with painful abdominal pain, hip pain, back pain, my fingers are numbed by diabetic. Drafting legal matter is no small task and painful, stressful.

66. When refile, my eyes were not opening properly with painful situation I drafted this complaint. This Court should order the any and all reasonable defendant to pay this \$5 million to me for filing this complaint for time, effort and pain and suffering.

67. DR Singh said that kidney should shutdown anytime when not proper treatment taken. I took life treating risk so this Court should order the any and all defendant as soon as possible to pay these expense. Any organ work defective function, my brain should malfunction, misfire signal to organ and cause sudden death. Exhibit(g).

68. Defendant's wrong doings are intentional, extreme cruel and uncivilized against the plaintiff. None in the society nor the jury should accept these extreme cruelty, uncivilized activities.

69. When I was working with DOE, NYc, Kadar or Sapna missed the deadline or unable to complete the task, I involved, completed the tasks multiple times.

70. Im more experience and expertise than any of the software engineers employed by Experis with DOE's contract.

71. Because nature of case is title vii, and plaintiff is continuously suffering from disability, plaintiff is unemployed yet, plaintiff is not run out of time for his claims by refile this case.

**EEOC PROCEEDING**

72. On Jan 13 2018 I have filed complaint with EEOC against the Experis.
73. In the EEOC proceeding, Experis was actively participated and they knew that I have timely filed charges with EEOC.
74. When I requested the EEOC to allow me to file court complaint, EEOC told the plaintiff that I should wait for the right to sue letter to be issued by them. Also EEOC told that Im layman to law and I should not file complaint with court without they provide me right to sue letter.
75. Im still waiting for the EEOC to provide me the right to sue letter. Multiple times I have send a letter to EEOC to provide me the right to sue letter
76. Whether I need to file complaint with any other authority, I pray this Court for order that where and whom do I need to file the complaint.
77. Based on the Original EEOC charge filing (Jan 2018) I have filed charge again on May 1 2021 against Experis for all race/ethnicity, color, gender, , National origin, religion, age, disability, Gina, US citizenship, retaliation.  
Second/new charge number is 520-2018-01631
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78. During the DOE contract change, Experis hired/re-hired over 60 foreign software engineer only I was denied for employment because Im US citizen and best performer than the foreign national software engineer. Till today Im unemployed. Im aggrieved by the defendants/Experis in my employment.

79. During my work with DOE, Sapna was clicking the mouse to act like she was working, she was hired/rehired by Experis.

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80. Defendants (any and all) less well treated the Plaintiff Karupaiyan than other employees and their wrong doings were intentional.

***Count: 1.***

**Racial/Ethnicity Discrimination in Violation of Title VII  
of the Civil Rights Act of 1964, 42 USC 2000e. et seq.**

81. The foregoing paragraphs are realleged and incorporated by reference herein.

82. Because of plaintiff is black race, tamil ethnicity, because of Ms Moore is white race, Sapna, Kadar, Chatterjee was not tamil-speaking ethnicity plaintiff was hired.

**83.** The Defendant's conduct as alleged at length herein constitutes discrimination based on race/ Ethnicity in violation of Title VII or any of the plaintiff claimed acts.

***Count:2 .***

**color Discrimination in Violation of Title VII  
of the Civil Rights Act of 1964, 42 USC 2000e. et seq.**

84. The foregoing paragraphs are realleged and incorporated by reference herein.

85. Because of plaintiff is black color and Sapna, Kadar, Ms More were white color, plaintiff was not hired to work with DOE.

**86.** The Defendant's conduct as alleged at length herein constitutes discrimination based on color in violation of Title VII or any of the plaintiff claimed acts.

**Count: 3.**

**Gender/Sex Discrimination in Violation of Title VII of the Civil Rights Act of 1964,  
42 USC 2000e. et seq.**

87. The foregoing paragraphs are realleged and incorporated by reference herein.
88. Because of old male and Sapna, Chatterjee were young women, plaintiff was not hired to work with DOE.
89. The Defendant's conduct as alleged at length herein constitutes discrimination based on Gender/Sex in violation of Title VII or any of the plaintiff claimed acts.

**Count: 4.**

**National Origin Discrimination in Violation of Title VII of the Civil Rights Act of 1964, 42 USC 2000e. et seq.**

90. The foregoing paragraphs are realleged and incorporated by reference herein.
91. Because of plaintiff is Indian origin and CEO is European origin, Moore is not Indian origin, Moore told plaintiff to go back to India, otherwise kill you and your kids if I continue looking job with Experis.
92. The Defendant's conduct as alleged at length herein constitutes discrimination based on National Origin in violation of Title VII or any of the plaintiff claimed acts.

**Count: 5.**

**Religion Discrimination in Violation of Title VII of the Civil Rights Act of 1964, 42 USC 2000e. et seq.**

93. The foregoing paragraphs are realleged and incorporated by reference herein.
94. Because plaintiff is hindu religion, Moore is Christian, Kadar, Ali, Asiz were muslim religion, plaintiff was not hired.

95. The Defendant's conduct as alleged at length herein constitutes discrimination based on religion in violation of Title VII or any of the plaintiff claimed acts.

**Count: 6.**

**Age Discrimination in Violation of the  
Age Discrimination in Employment Act (ADEA), and Title VII**

96. The foregoing paragraphs are realleged and incorporated by reference herein.

97. **Because of Plaintiff is over 40 years old, and Sapna, Kadar, Chatterjee were young in 30 years old, plaintiff was not hired.**

98. The Defendant's conduct as alleged above constitutes discrimination based on Age discrimination in violation of ADEA and Title VII or any of the plaintiff claimed acts.

**Count: 7.**

**Disability Discrimination in Violation of Title VII of the  
Civil Rights Act of 1964, 42 USC 2000e. et seq. and The Americans with Disabilities  
Act (ADA) and amended**

99. The foregoing paragraphs are realleged and incorporated by reference herein.

100. **Because of plaintiff is diabetic and/or genetically ill plaintiff was not hired.**

101. The Defendant's conduct as alleged at length herein constitutes discrimination based on Disability in violation of The Americans with Disabilities Act (ADA)/adaaa, and Title VII or any of the plaintiff claimed acts.

**Count: 8.**

**US citizenship Discrimination in Violation of Title VII of the  
Civil Rights Act of 1964, 42 USC 2000e. et seq.**

102. The foregoing paragraphs are realleged and incorporated by reference herein.

103. Because of Im US citizen and Sapna, Kadar, Chatterjee were foreigner, Plaintiff was not hired.

104. The Defendant's conduct as alleged at length herein constitutes discrimination based on US citizen to favor foreign national against US citizen in violation of Title VII and U.S.C. § 1324b (Immigration and Nationality Act (INA)), NYHRL/NYCHRL or any of the plaintiff claimed acts.

**Count:9.**

**Refused/Failure to hire**

105. The foregoing paragraphs are realleged and incorporated by reference herein.

106. Because plaintiff is black old male from India with us citizen and disability plaintiff was not hired by Experis.

107. The Defendant's conduct as alleged above constitutes **failure to hire** in violation of Title VII, ADA, GINA, and the ADEA, NY/NYC human rights or any of the plaintiff claimed acts.

**Count:10.**

**emotional distress (intentional)**

108. The foregoing paragraphs are realleged and incorporated by reference herein.

109. **Because no one in the civilized society accept that Ms Moore telling the plaintiff that plaintiff was sick old black and go back to India. Also refused to employ for the need of sick/illness. When the plaintiff hear this matter, few days plaintiff did not sleep and cried.**

110. The Defendant's conduct as alleged above constitutes emotional distress in violation of Title VII, ADA/adaaa, , and the ADEA, NY/NYC human rights, section 1981 or any of the plaintiff claimed acts.

**Count:11.**

Unequal terms and conditions, **Less well treatment**

111. The foregoing paragraphs are realleged and incorporated by reference herein.

112. **Because plaintiff is black old disabled tamil and Moore, sapna , kadar , Chatterjee were different protected class, plaintiff was not hired.**

113. The Defendant's conduct as alleged above constitutes Unequal terms and conditions, **Less well treatment** in violation of Title VII, ADA/adaaa, , and the ADEA, NY/NYC human rights, section 1981 or any of the plaintiff claimed acts.

**Count:12. Fraud**

114. The foregoing paragraphs are realleged and incorporated by reference herein.

115. Ms Moore Kadar and Sapna were incumbents to DOE but they were contract workers with h1b work permit for foreigner but refused to hire me but hired Kadar and sapna

116. The Defendant's conduct as alleged above constitutes fraud in violation of Title VII, ADA/adaaa, and the ADEA, NY/NYC human rights, section 1981 or any of the plaintiff claimed acts.

**Count:13.**

**Violation of damaging income, lose of income, causing unemployment,Loss of Income- Present, feature**

117. The foregoing paragraphs are realleged and incorporated by reference herein.

118. The Defendant's conduct as alleged above constitutes **Violation of Damaging income, causing unemployment, loss of income, present, feature** in violation of Title VII, ADA/adaaa, GINA, and the ADEA, NY human rights, section 1981 or any of the plaintiff claimed acts.

**Count: 14.**

**Failure to accommodation the disability Discrimination in Violation of Title VII of the Civil Rights Act of 1964, 42 USC 2000e. et seq. and The Americans with Disabilities Act (ADA) and amended**

119. The foregoing paragraphs are realleged and incorporated by reference herein.

120. **Because of plaintiff is diabetic and/or genetically ill plaintiff was not hired.**

121. The Defendant's conduct as alleged at length herein constitutes discrimination based on Disability in violation of The Americans with Disabilities Act (ADA)/adaaa, and Title VII or any of the plaintiff claimed acts.

**Count:15.**

**Dishonoring family court order/contempt of court,**

122. The foregoing paragraphs are realleged and incorporated by reference herein.

123. **Because Ms Moore calling the family court stupid and they do not honor the family court order in my employment, refused to hire me.**

124. **Because unemployment, plaintiff went to jail twice on each time tow week.**

125. **Ms Moore calling beloved Honorable family court judge stupid.**

126. The Defendant's conduct as alleged above constitutes dishonoring family court/contempt of court in violation of Title VII, ADA/adaaaa, , and the ADEA, NY/NYC human rights, section 1981 or any of the plaintiff claimed acts.

**Count:16.**  
**Payroll tax evasion/Money laundering**

127. The foregoing paragraphs are realleged and incorporated by reference herein.

128. **Experis offshore the development to India for the purpose of payroll tax evasion/money laundering.**

129. **Because unemployment, plaintiff went to jail twice on each time two week.**

130. The Defendant's conduct as alleged above constitutes Payroll tax evasion /money laundering in violation of Title VII, ADA/adaaaa, , and the ADEA, NY/NYC human rights, section 1981 or any of the plaintiff claimed acts.

**Count:16.**  
**Retaliation**

131. The foregoing paragraphs are realleged and incorporated by reference herein.

132. **Because of I complained the DOE's previous contract about refused to pay or illegally delayed in payment , Ms Moore refused to hire is retaliation.**

133. **Experis offshore the development to India for the purpose of payroll tax evasion.**

134. **Because unemployment, plaintiff went to jail twice on each time tow week.**

135. The Defendant's conduct as alleged above constitutes Retaliation in violation of Title VII, ADA/adaaa, , and the ADEA, NY/NYC human rights, section 1981 or any of the plaintiff claimed acts.

**Count: 17.**

**Genetic Discrimination in Violation of GINA and The Americans with Disabilities Act (ADA) and amended**

136. The foregoing paragraphs are realleged and incorporated by reference herein.

137. **Because of plaintiff is diabetic, lungs ill formed AND the defendants knew it, plaintiff was not hired by the defendants.**

The Defendant's conduct as alleged at length herein constitutes discrimination based on Disability in violation of The Americans with Disabilities Act (ADA)/adaaa, GINA and Title VII or any of the plaintiff claimed acts.

**Count: 18.**

**Corruption**

138. The foregoing paragraphs are realleged and incorporated by reference herein.

139. **Because of plaintiff is diabetic, lungs ill formed AND the defendants knew it, plaintiff was not hired by the defendants.**

140. **Defendants paying commission DOE Mangers/ buying officer decisions of DOE to employee/place foreigner and against US citizen is corrupt business practice.**

141. The Defendant's conduct as alleged at length herein constitutes discrimination based on Corruption in violation of Title VII, false claim act or any of the plaintiff claimed acts.

**Count: 18.**

**Unjust enrichment**

142. The foregoing paragraphs are realleged and incorporated by reference herein.

143. **Because of plaintiff is diabetic, lungs ill formed AND the defendants knew it, plaintiff was not hired by the defendants.**

144. **Defendants paying commission to DOE manager to employee/place foreigner and against US citizen is corrupt business practice. Evading tax/payroll tax.**

145. The Defendant's conduct as alleged at length herein constitutes discrimination based on Unjust enrichment in violation of Title VII, false claim act or any of the plaintiff claimed acts.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Palani Karupaiyan prays for the following relief:

- a. A declaratory judgment that the practices complained of herein are unlawful and violate Title VII, 42 U.S.C. §2000e *et seq.*,

Title VII of the Civil Rights Act of 1964. ("Title VII"),

The Age Discrimination in Employment Act (ADEA),  
The Americans with Disabilities Act (ADA) and its amended,  
U.S.C. § 1324b (Immigration and Nationality Act (INA)) ,  
Racketeer Influenced and Corrupt Organizations Act-Rico  
Sarbanes–Oxley Act of 2002,  
**New York Human Rights Law (NYHRL),**  
The New York City Human Rights Law (NYCHRL),  
42 U.S.C. §§ 1981-1995 (section 1981).

Civil Rights Act of 1991 (Section 1981)

b. A permanent injunction against Experis and its officers, agents, successors, employees, representatives, and any and all persons acting in concert with defendants, prohibiting them from engaging in unlawful Race, color, ethnicity/heritage, Religion, National Origin, Age, Disability and **US citizenship discrimination against employees** or applicants for employment; **offshoring USA jobs.**

c. A permanent injunction against Defendants and its officers, agents, successors, employees, representatives, and any and all persons acting in concert with Defendants, prohibiting them from engaging in **unlawful favoring foreigner against US citizen in fulltime/contract job or outsourcing.**

- d. Permanent injunction against the defendants and its officers should not access H1,L1, B1 work permit visa.
- e. Permanent injunction against the defendants that should not involve corrupt business practices.
- f. Permanent injunction against the defendants that they should rebound/insource the projects from India because for the purpose of payroll tax evasion against the United States and its states the outsource happened/happening.
- g. Permanent injunction against the defendants that they should not involve in payroll tax evasion and/or help their clients, business partners, IT/Software development partners in payroll evasion, outsource, offshore development.
- h. Order the defendants to deposit/pay to US Treasury 3 times amount they send out of USA to offshoring the jobs outside of United States since past 20 years. Until this money deposited, this court should lock Ms Moore and, Mr Jonas Prising in Jail. Same amount of money send out to offshore the American jobs the Experis/defendants should pay to the plaintiff.
- i. Back pay and Front pay at the Certified Software Architect pay level (including pay increases yearly, inflation) for life time until plaintiff reaches the age of 85 years when plaintiff would have retired. This salary should be calculated hourly rate of what Experis billed the DOE per hour This Court should order each defendant(s) including Experis to pay the plaintiff sum of \$80 million to the

plaintiff life time salary. Im 20 times efficient engineer which also need to be considered.

j. Compensatory and punitive damages;

1. Compensatory Damages: I pray this Court for \$100 million compensation by the each and every defendant(s) for each discrimination(s) and/or any and all wrong doings including health condition down/injuries/ damages.

2. Punitive damages:

Plaintiff resourceful and skilled person. 20 times more efficient than average software engineer. After calculating Plaintiff Palani Karupaiyan's life time salary, Compensatory this salary should be multiplied 20 times because of corrupt business practice the defendants denied the employment to the US citizen plaintiff.

k. Reasonable fees for time and effort of the plaintiff, pain and suffering and all expenses and costs of this action to the plaintiff. Since Aug 26 2019, typing on this case with diabetic pain, numbness, fingers are sharp pinching pain while typing and further injured and being unemployed.

Plaintiff pray this Court for reasonable \$250000.00 for time and effort of plaintiff for reasonable fee. I saw an attorney for employment dispute who asked \$15000 down payment and \$5000 per hour billing since employment based claims, outsourcing, payroll tax evasion, money laundering are very difficult cases. So Im not able to have attorney now due to financial hardship. I pray this Court to order the defendant to pay \$5000 per hour for

time and effort, pain and suffering for this case for the past and feature hours involved. Also this Court should order the defendant to pay the time and effort, pain and suffering on monthly basis, otherwise the defendant should be delaying the case further.

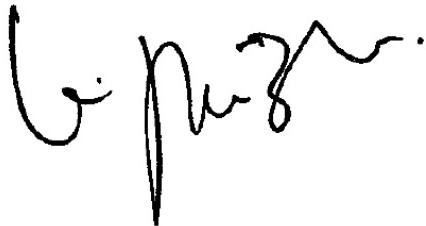
Plaintiff Palani Karupaiyan pray this Court for appoint an attorney for me because Im disabled and unaffordable to have attorney and order the each and every defendant to pay for the appointed attorney

- I. Pre-judgment interest; and
- m. Such other and further legal and equitable relief as this Court deems necessary, just, and proper.

DEMAND FOR JURY TRIAL

Plaintiff Palani Karupaiyan demands a trial by jury of all issues so triable in this action.

**Respectfully submitted**



Palani Karupaiyan  
an  
Ph: 212-470-2048(m) palanikay@gmail.com

- VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support

after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: May 21, 2021.

Signature of Plaintiff 

Printed Name of Plaintiff Palani Karupaiyan

